

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, *et al.*

Plaintiffs,

V.

GREG ABBOTT, *et al.*,

Defendants.

Case No. 3:21-cv-00259
[Lead Case]

TEXAS STATE CONFERENCE OF
THE NAACP,

Plaintiff,

V.

GREG ABBOTT, *et al.*,

Defendants.

Case No. 1:21-cv-01006
[Consolidated Case]

PLAINTIFF TEXAS NAACP'S UNOPPOSED EXHIBITS

Plaintiff Texas State Conference of the NAACP (“Texas NAACP”) have not received objections to the following exhibits and respectfully move the following exhibits into evidence. Defendants have reviewed the below list and have agreed that they may be entered into evidence.

Trial Exhibit No.	Bates No. / Description
PL_TXNAACP 1	Memorandum from Sharon Carter and Hugh Brady to Texas House Committee Chairs re Options for Conducting Interim Committee Business
PL_TXNAACP 2	House District 54 - District Population Analysis with Public Schools
PL_TXNAACP 3	State Senate District 17 - District Population with County Schools
PL_TXNAACP 4	BILL_FILE-0017994 - BILL_FILE-0018027
PL_TXNAACP 5	BILL_FILE-0018028 - BILL_FILE-0018060

Trial Exhibit No.	Bates No. / Description
PL_TXNAACP 6	TEX_LEG_REDISTRICKING_003840 - TEX_LEG_REDISTRICKING_003872
PL_TXNAACP 7	BILL_FILE-0018061 - BILL_FILE-0018111
PL_TXNAACP 8	BILL_FILE-0018112 - BILL_FILE-0018132
PL_TXNAACP 9	BILL_FILE-0018184 - BILL_FILE-0018235
PL_TXNAACP 10	SRC_000200 - SRC_000251
PL_TXNAACP 11	STATE-REDISTRICKING_002223
PL_TXNAACP 12	STATE-REDISTRICKING_002233
PL_TXNAACP 13	STATE-REDISTRICKING_002237
PL_TXNAACP 14	STATE-REDISTRICKING_002284
PL_TXNAACP 15	BILL_FILE-0018236 - BILL_FILE-0018314
PL_TXNAACP 16	SRC_000032 - SRC_000110
PL_TXNAACP 17	House District 54 - District Population Analysis with School District Subtotals
PL_TXNAACP 18	House District 54 - District Election Report
PL_TXNAACP 19	BILL_FILE-0018396 - BILL_FILE-0018474
PL_TXNAACP 25	GOBERDOJ00406096666 - GOBERDOJ00406096674
PL_TXNAACP 30	BILL_FILE-0006616
PL_TXNAACP 31	GOBERDOJ014374
PL_TXNAACP 32	BILL_FILE-0004561 - BILL_FILE-0004589
PL_TXNAACP 33	Email from C. Gober to S. Field re "Unified US House of Representatives Map for Texas"
PL_TXNAACP 34	Email from C. Gober to A. Mackin re "Unified US House of Representatives Map for Texas"
PL_TXNAACP 40	STATE-REDISTRICKING_001529
PL_TXNAACP 41	STATE-REDISTRICKING_001530 – STATE-REDISTRICKING_001539
PL_TXNAACP 51	Compare Committee Plan C2101 to 9/25/21
PL_TXNAACP 53	Map of House Districts - Proposed Plan H2101
PL_TXNAACP 54	BILL_FILE-0002178 - BILL_FILE-0002235
PL_TXNAACP 55	NAACP_TEX_LEG_REDISTRICKING_012624 - NAACP_TEX_LEG_REDISTRICKING_012662
PL_TXNAACP 58	Compare Committee Plan C2116 to 9/30/21
PL_TXNAACP 59	BILL_FILE-0004653 - BILL_FILE-0004660
PL_TXNAACP 62	BILL_FILE-0016400 - BILL_FILE-0016659
PL_TXNAACP 64	NAACP_TEX_LEG_REDISTRICKING_012751 - NAACP_TEX_LEG_REDISTRICKING_012789
PL_TXNAACP 68	BILL_FILE-0012400 - BILL_FILE-0012437
PL_TXNAACP 70	BILL_FILE-0006529 - BILL_FILE-0006531
PL_TXNAACP 72	BILL_FILE-0001057 - BILL_FILE-0001101

Trial Exhibit No.	Bates No. / Description
PL_TXNAACP 73	BILL_FILE-0005801 - BILL_FILE-0005809
PL_TXNAACP 74	Population and Voter Data and Voter Registration Comparison - House Plan H2228
PL_TXNAACP 75	American Community Survey - House Plan H2228
PL_TXNAACP 76	District Population Analysis with County Subtotals - House Districts - H2261
PL_TXNAACP 77	BILL_FILE-0005842 - BILL_FILE-0005881
PL_TXNAACP 79	Email from C. Garcia to S. Opperman re "SB4"
PL_TXNAACP 80	Population and Voter Data and Voter Registration Comparisons - House Plan H2276
PL_TXNAACP 81	American Community Survey - House Plan H2276
PL_TXNAACP 82	STATE-REDISTRICTING_001227 – STATE-REDISTRICTING_001289
PL_TXNAACP 84	Population and Voter Data with Voter Registration Comparison - House Districts - H2316
PL_TXNAACP 85	District Population Analysis with County Subtotals - House Districts - H2316
PL_TXNAACP 88	BILL_FILE-0013229 - BILL_FILE-0013276
PL_TXNAACP 89	BILL_FILE-0006614
PL_TXNAACP 90	American Community Survey Special Tabulation - House Districts Plan H2100
PL_TXNAACP 91	District Population Analysis with County Subtotals Congressional Districts - Plan C2195
PL_TXNAACP 92	Election Analysis - House Districts Plan H2261 2020 Election
PL_TXNAACP 93	Population, Voter Registration, Turnout, and SSTO Analysis - House Districts - H2261
PL_TXNAACP 94	District Population Analysis with County Subtotals House Districts - Plan H2322
PL_TXNAACP 96	LULAC_TX_LEG_REDISTRICTING_015106
PL_TXNAACP 97	LULAC_TX_LEG_REDISTRICTING_015137
PL_TXNAACP 98	BILL_FILE-0006617 - BILL_FILE-0006617
PL_TXNAACP 99	House Districts 54-55 Map
PL_TXNAACP 100	House Districts 54-55 Bell County Proposed Districts
PL_TXNAACP 101	Representative Anchia Point of Order- SB 6_ Rule 13, Sec 9d

Trial Exhibit No.	Bates No. / Description
PL_TXNAACP 102	Plan H2321
PL_TXNAACP 103	Map of Plan H2321 - Travis County
PL_TXNAACP 105	Map - Alt2b Alternative Plan State of Texas
PL_TXNAACP 106	Map - Senate Alt5 Alternative Plan State of Texas
PL_TXNAACP 107	Map - Unified Senate Base Alternative Plan
PL_TXNAACP 108	Map - Unified SenAlt1 Alternative Plan
PL_TXNAACP 109	Map - Unified Senate Base 2 Alternative Plan
PL_TXNAACP 110	Map - Unified Senate Base 3 Plan Alternative Plan
PL_TXNAACP 111	Map - Unified Senate Base 4 Plan (V Gonzalez Amendment 15-34)
PL_TXNAACP 112	Map - Aggie Alternative Plan
PL_TXNAACP 113	Map - Mustang Alternative Plan
PL_TXNAACP 114	Map - SenAlt2b - Alternative Plan
PL_TXNAACP 115	Map - SenAlt2 Alternative Plan
PL_TXNAACP 116	Map - Unified SenAlt2 Alternative Plan
PL_TXNAACP 117	Map - Unified Senate Base 4 - Ellzey Amendment to Alternative Plan
PL_TXNAACP 118	Map - Unified Senate Base 4 - Fort Bliss Amendment to Alternative Plan
PL_TXNAACP 119	Map of Plan S2101 Dallas area
PL_TXNAACP 120	Map of Plan S2101 Ft. Worth area
PL_TXNAACP 121	Map of Plan S2119 Dallas area
PL_TXNAACP 122	Map of Plan S2119 Ft. Worth area

Trial Exhibit No.	Bates No. / Description
PL_TXNAACP 123	Map of Plan H2228
PL_TXNAACP 124	Map of Plan H2276
PL_TXNAACP 125	Map of Plan H2276 - San Antonio area
PL_TXNAACP 126	Map of Plan H2276
PL_TXNAACP 127	Landgraf Amendment Map
PL_TXNAACP 128	Map - Deviation of House Districts from Ideal District Population - 2020 Census
PL_TXNAACP 129	Map - Deviation of House Districts from Ideal District Population - 2020 Census
PL_TXNAACP 130	Maps - Unified Congress Alternative Plan - Texas
PL_TXNAACP 131	State Senate Districts Deviation from Ideal District Population - 2020 Census
PL_TXNAACP 132	Districts 54-55 - Map of Plan H2101
PL_TXNAACP 133	Districts 54-55 - Map of Plan H2166
PL_TXNAACP 134	Map of Bell County State House Districts Proposed Plan H2216

Dated: June 5, 2025

Respectfully submitted,

/s/ Lindsey B. Cohan
Lindsey B. Cohan
Texas Bar No. 24083903
DECHERT LLP
515 Congress Avenue, Suite 1400
Austin, TX 78701
(512) 394-3000
lindsey.cohan@dechert.com

David Rollins-Boyd*
Jennifer Nwachukwu (TXWD Bar No.
170620013)
Jeremy Lewis*
LAWYERS' COMMITTEE FOR
CIVIL RIGHTS UNDER LAW
1500 K Street, Suite 900
Washington, DC 20005
(202) 662-8600
drollins-boyd@lawyerscommittee.org
jnwachukwu@lawyerscommittee.org
jlewis@lawyerscommittee.org

Neil Steiner*
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3822
neil.steiner@dechert.com

Robert Notzon
Texas Bar No. 00797934
THE LAW OFFICE OF ROBERT
NOTZON
1502 West Avenue
Austin, Texas 78701
(512) 474-7563
robert@notzonlaw.com

Gary Bledsoe
Texas Bar No. 02476500
THE BLEDSOE LAW FIRM PLLC
6633 Highway 290 East #208
Austin, Texas 78723-1157
(512) 322-9992
gbledsoe@thebledsoelawfirm.com
*Attorney only as to Texas NAACP's claims
related to Texas state senate and state house
plans*

Anthony P. Ashton*
NAACP OFFICE OF THE GENERAL
COUNSEL
4805 Mount Hope Drive
Baltimore, MD 21215
(410) 580-577

aashton@naacpnet.org

Janette M. Louard
NAACP OFFICE OF THE GENERAL
COUNSEL
4805 Mount Hope Drive
Baltimore, MD 21215
(410) 580-577
jlouard@naacpnet.org
Attorneys appearing of counsel

Carroll Rhodes*
LAW OFFICES OF CARROLL RHODES
P.O. Box 588
Hazlehurst, MS 39083

**Admitted pro hac vice*

*ATTORNEYS FOR THE TEXAS STATE
CONFERENCE OF NAACP*

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on June 5, 2025, I served via email a copy of the foregoing and all attachments on counsel of record.

/s/ Lindsey B. Cohan
Lindsey B. Cohan